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16 UNITED STATES DISTRICT COURT
17 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
18

19 MICHAEL LAVIGNE, *et al.*,
20 Plaintiffs,
21 vs.
22 HERBALIFE LTD., *et al.*,
23 Defendants.
24

CASE NO. 2:18-cv-07480-JAK (MRWx)
[Related Case 2:13-cv-02488-BRO-RZ]
**PLAINTIFFS' APPLICATION FOR
LEAVE TO FILE UNDER SEAL**

Assigned to Hon. John A. Kronstadt,
Courtroom 10B

APPLICATION TO FILE UNDER SEAL

Pursuant to Local Rule 79-5, Plaintiffs PATRICIA RODGERS, JEFF RODGERS, IZAAR VALDEZ, and JENNIFER RIBALTA ("Plaintiffs") hereby applies for leave of Court to file Exhibit 3 to Plaintiffs' Supplemental Memorandum Re: Plaintiffs' Motion to Compel Discovery [ECF No. 290] under seal. Exhibit 3 is a July 13, 2016 correspondence regarding an "Extravaganza Committee Call" bearing bates stamp HLF_023335 – HLF_023336. Plaintiffs do not believe the document is Confidential in any respect.

Counsel for the parties in this matter were informed of Plaintiffs' intent to seek leave to file Exhibit 3 under seal. *See* Declaration of Yaniv Adar In Support of Application for Leave to File Under Seal, filed concurrently herewith.

Plaintiffs respectfully request that the Court grant the Application to File Under Seal Exhibit 3 to Plaintiffs' Supplemental Memorandum Re: Plaintiffs' Motion to Compel Discovery.

Executed this 30th day of November, 2020 at Miami, Florida.

DATED: November 30, 2020 Respectfully submitted,

Mark Migdal & Hayden

By: /s/ Yaniv Adar

Yaniv Adar

Attorneys for Plaintiffs Patricia Rodgers,
Jennifer Ribalta, and Izaar Valdez

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